



Transportation Division

304 PENNSYLVANIA AVE. S.E., WASHINGTON, DC 20003-1147
PHONE: 202-543-7714 • FAX: 202-544-3024 • www.utu.org

JOHN PREVISICH
President

JOHN RISCH
National Legislative Director

April 25, 2017

Mr. Robert Lauby
Associate Administrator for Safety
Federal Railroad Administration
1200 New Jersey Avenue SE
Washington, DC 20590

Dear Mr. Lauby:

We are very concerned with railroads operating trains that are incredibly long, which create numerous safety concerns. Included with this letter is a train manifest of a CSX train with 234 cars that weighted more than 27,000 tons and was more than 2 ½ miles long.

The specific issues that we are concerned about are:

- 1) Radio Communications: If a conductor must walk to the rear of the train that is 2 ½ miles long, he is oftentimes no longer able to communicate via portable radio with the locomotive engineer due to the long distance. Portable radios regularly lose communications beyond a mile and a half depending on the terrain. This has led railroad managers to order crews to use their personal cell phones to supplement radio communications. However, many crew members do not carry personal cell phones on the job because of employer prohibitions. Furthermore, cell phone service is not always available.
- 2) Long trains block more crossings: This not only serves as an inconvenience, but also impacts life and death situations for first responders when emergency vehicles are blocked at crossings. Walking back more than 2 miles to cut a rail crossing with an ineffective radio simply does not work when an emergency is involved. Most rail crossings are located on section lines which means that many crossings are one mile apart not two and one-half miles apart as some of these trains are.
- 3) The inability to maintain brake pipe pressure in these excessively long trains can lead to all sorts of mechanical and safety issues.
- 4) Our reports also are that crews are not adequately trained for such extreme length trains, and we suggest that this is in violation of 49 CFR 240.213 training procedures. Specifically, crews are not receiving the proper knowledge and skills to safely operate a locomotive or train in the most demanding class or type of service that the person will be required to perform.

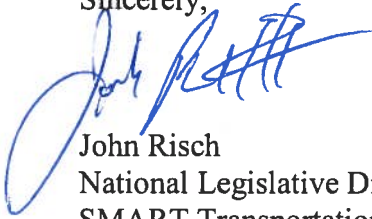
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- 5) CSX is not alone. BNSF ran a train on 4/17/17 departing Superior WI that had 246 cars with a length of 13,647 ft. UP is also running these excessively long trains with some carrying hazardous materials.

While I am fully aware that there are, no federal regulations limiting the size of trains, running these monster trains are inherently unsafe and FRA has broad authority to investigate the practice and put an end to it. I ask that you review the issue of excessive train length and then issue an Emergency Order limiting the length of trains.

Sincerely,



John Risch
National Legislative Director
SMART Transportation Division

TMCD.TMXX CTDS TRAIN SHEET REVIEW DATE 10031519
 OPT: PRNT TRAIN ID: Q36827 ORIGIN: GARREY PRT:
 TRAIN ID ORIGIN DESTIN ADJ DEPT ACT DEPT ACT ARRV
 Q36827 GARREY WILLAE 09280305 E 09280416 09280821
 SD CQ TY TF PROFILE SCH: 09272015 09280045
 VARI: 0650 L 0801 L 0736 L

PTC STATUS _

STATISTICS	LDS	MTY	TONS	TOTES	LNGLTH	SPD	AXLE	BRK	-FORCE--	--SPEED	CLASS-----
DEPARTURE:	203	031	27160	000	12879	050	0936	234	05870847	1	- FREIGHT
LAST RPRTD:	203	031	27160	000	12879	050	0936	234	05870847	1	- FREIGHT
ARRIVAL:	203	031	27160	000	12879						

EOT: CSXE 58235 EOT: _ TRCE: _
 UTD: _ TL#: _
 JF#: _ JF2: _ ROAD: _ FTX: _

(TMC) TRAIN SHEET COMPLETION (_) TRAIN SHEET DELETION

--LOCOMOTIVE--	TRN	LOCO	FAC	HORSE	TRACTIVE	WORK	-----PTC-----				
#	ID	POS	-STATUS-	DIR-	TON	LNG	POWER	EFFORT	HP	EQUIP	STATUS-
001	CSXT	3080	001	RUNNING	FWRD	216	074	04400	0160000	Y	N
002	CSXT	7360	002	RUNNING	FWRD	197	071	04000	0108600	Y	N
003	CSXT	7356	003	RUNNING	BACK	197	071	04000	0108600	Y	N
004	CSXT	5324	004	UNKNOWN	BACK	216	074	04000	0108600	N	Y

CREW 1 NAME ON DUTY LOCATI TIM RELV LOCATI EXPR ID NUMBER
 ENGR: KR BAILEY 09280220 GARREY 09281112 WILLAE 1420 1241326
 COND: KC STEVENS 09280220 GARREY 09281112 WILLAE 1420 1227905
 P: HANDLED: 200 LOADS 034 EMPTIES 27161 TONS TRAIN BULLETIN: 14600

CREW 2 NAME ON DUTY LOCATI TIM RELV LOCATI EXPR ID NUMBER
 P: HANDLED: LOADS EMPTIES TONS TRAIN BULLETIN:

CREW 3 NAME ON DUTY LOCATI TIM RELV LOCATI EXPR ID NUMBER
 P: HANDLED: LOADS EMPTIES TONS TRAIN BULLETIN:

CREW 4 NAME ON DUTY LOCATI TIM RELV LOCATI EXPR ID NUMBER
 P: HANDLED: LOADS EMPTIES TONS TRAIN BULLETIN:

CREW 5 NAME ON DUTY LOCATI TIM RELV LOCATI EXPR ID NUMBER
 P: HANDLED: LOADS EMPTIES TONS TRAIN BULLETIN:

P: HANDLED: LOADS EMPTIES TONS TRAIN BULLETIN:

** ENCOUNTERED OPERATIONAL DELAYS **

HHMM LOCATI R DV SD C RS REASON DATA REMARKS
 0101 GARRET N CG CQ T OH ENROUTE TRA ENROUTE TRAIN DELAY
 0001 SHERWA N CG CQ S MM MISCELLANEO MISCELLANEOUS MESSAGE:9M - DIVERGING MOVE
 0006 DEFIAA N CG CQ E MW SPEED RESTR SPEED RESTRICTION ENCOUNTERED
 0017 NBALTI N GL CE T OH ENROUTE TRA ENROUTE TRAIN DELAY
 0002 WOODST N GL FS E TC TRACK CONDI TRACK CONDITION/BROKEN RAIL:H79127
 0000 JTOWR N GL WT T HO HELD OUT OF HELD OUT OF TERMINAL
 0047 JTOWR N GL WT T OH ENROUTE TRA ENROUTE TRAIN DELAY

** ENCOUNTERED FAILURE DELAYS **

HHMM LOCATI R DV SD C RS REASON DATA REMARKS

** ENCOUNTERED DISPATCH INCIDENT **

NO DISPATCH INCIDENTS HAVE BEEN REPORTED.....

** TRAIN REMARKS/COMMENTS **

NO REMARKS OR COMMENTS HAVE BEEN REPORTED.....

** TRAIN POSITION TIME **		* MET/PASSED *		M	A							
STATION	MILES	D	ON	OUT	TRN ID	TIME	P	D	ETA	INTM	ETA	DEST
GARRET	.	E	0408									WIL 0734
AUBURN	03.48	E	0416	0416	Q00327	09280416	W					WIL 0739
WSTEEL	07.18	E	0428									WIL 0739
SAIINN	01.27	E	0430	0431	J71727	09280430	W					WIL 0739
INDO	03.24	E	0435									WIL 0739
ROSEDL	08.48	E	0448									WIL 0739
SHERWA	07.98	E	0459									WIL 0741
DEFIAA	09.54	E	0517	0517								WIL 0744
WESDEF	02.64	E	0521									WIL 0744
EASDEF	01.69	E	0524									WIL 0743
WSTALY	01.28	E	0526									WIL 0743
HOLGAT	07.68	E	0538									WIL 0743
HAMLEA	05.10	E	0543									WIL 0743
EHAMLR	02.10	E	0546									WIL 0742
WDESHL	04.75	E	0552	0552								WIL 0735
EDESHL	00.38	E	0553									WIL 0735
HOYTVI	06.13	E	0602	0602	Q15828	09280602	E					WIL 0736
NBALTI	04.97	E	0627	0627								WIL 0753
GALATE	01.70	E	0632	0632								WIL 0754
GODSND	09.92	E	0652	0652								WIL 0758
WOODST	01.58	E	0659									WIL 0800
WFOSTO	00.40	E	0700									WIL 0800
FTOWER	00.20	E	0701	0701								WIL 0759
EFSTRA	01.42	E	0703	0704	K93527	09280703	W					WIL 0757
TIFFIN	10.20	E	0718									WIL 0757
REPUBL	09.30	E	0734									WIL 0756
ATIJCT	07.20	E	0756									WIL 0756
DANIEL	04.34	E	0806	0806	K93427	09280806	W					WIL 0806

JTOWR 00.90 E 0811 0811 WIL 0843

** TRAIN SHEET SETOUTS/PICKUPS **

		SETOUTS				WORK DONE		PICKUPS				WORK DONE	
STATION	LDS	MTY	TONS	TOTE	FEET	Y/N	LDS	MTY	TONS	TOTE	FEET	Y/N	
NO SETOUTS / PICKUPS HAVE BEEN REPORTED.....													